

C6B-CC-1206

WHERE JESUS CHRIST, THE BREAD OF LIFE, AND THE FRUIT OF SALVATION LIVES.



January 26, 2012

*Via First Class U.S. Mail*

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

Received & Inspected

FEB - 8 2012

FCC Mail Room

Re: Petition for Undue Burden Exemption  
from Closed Captioning Rules

Dear Ms. Dortch:

This letter is submitted pursuant to 47 C.F.R. §79.1(f) and requests an exemption on behalf of Kingdom Covenant Christian Center from the FCC's closed captioning rules based on undue burden. In accordance with 47 C.F.R. §79.1(f)(4), the original and two copies of this letter and all support are being provided.

Kingdom Covenant Christian Center is a donor supported non-profit organization under the laws of the state of New Jersey. Since 2011 we have produced a weekly 30-minute video program called "Keep it Kingdom/Vandy Colter". Keep it Kingdom/Vandy Colter is a program that impacts lives with biblical teaching. "Keep it Kingdom/Vandy Colter" is locally produced in-house by Kingdom Covenant Christian Center staff, and is broadcast to the public on the WORD Network and Direct TV. Kingdom Covenant Christian Center pays the WORD Network \$650 per week to air the show over its broadcast facilities.

Captioning the program would present an undue burden for several reasons. First, since we do not have the resources to caption the program ourselves, it would have to be sent to an outside source for captioning. Second, the added production cost for captioning would make production of the program unaffordable and the time for captioning would make meeting The WORD Network air-date deadlines impossible.

PASTOR VANDY L. COLTER III

427 W. ANDIS AVE. VINELAND, NJ 08360 856-205-0555 PHONE 1-877-256-4600 FAX

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Finally, a captioning requirement would ultimately cause us to either terminate or severely limit production of the program, and cause us to lose viewers and supporters who would no longer be able to regularly view the program.

Kingdom Covenant Christian Center respectfully submits that the basis for its captioning exemption request based on undue burden is practically identical to the facts justifying undue burden exemptions in the Commission's 2006 Memorandum Opinion & Order, *In Re Anglers for Christ Ministries, Inc. & New Beginning Ministries Petitions for Exemption from Closed Captioning Requirements*, CGB-CC-0005 and -0007, 21 FCC Rcd 10094 (September 12, 2006). In light of that precedent, and the facts set forth in this letter, we respectfully request that Kingdom Covenant Christian Center be granted an undue burden exemption from the captioning requirements for "Keep it Kingdom/Vandy Colter".

In support of our request, we provide a copy of certain documents establishing Kingdom Covenant Christian Center's non-profit status. In addition, as permitted by §1.16 of the Commission's rules, we are providing a Declaration Under Penalty of Perjury in support of the facts set forth in this request for exemption in lieu of the affidavit required by §79.1(f)(9). Should the Commission require additional information, please contact the undersigned individual.

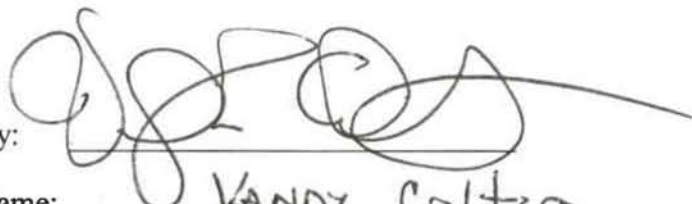
Respectfully:

Kingdom Covenant Christian Center

By:

Printed Name:

Title:

  
VANDY Colter  
Sr. Pastor & Bd President

PASTOR VANDY L. COLTER III

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**Declaration Under Penalty of Perjury of Kingdom Covenant Christian Center**

**in support of Kingdom Covenant Christian Center's Request for Undue Burden  
Exemption from Closed Captioning Rules**

I, Vandy Colter, Senior Pastor of Kingdom Covenant Christian Center, do hereby declare under penalty of perjury of the laws of the United States of America that the following statements are true and correct.

1. Kingdom Covenant Christian Center is a donor supported non-profit organization organized under the laws of the state of New Jersey.

2. Since 2011, Kingdom Covenant Christian Center has produced a 30-minute video program called "Keep it Kingdom/Vandy Colter". "Keep it Kingdom/Vandy Colter" is a program that impacts lives with biblical teaching. "Keep it Kingdom/Vandy Colter" is locally produced in-house by Kingdom Covenant Christian Center staff, and is broadcast to the public on the WORD Network. Kingdom Covenant Christian Center pays the WORD Network \$650.00 per week to air the show over its broadcast facilities.

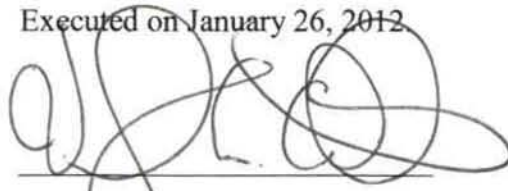
3. Kingdom Covenant Christian Center has discussed with the WORD NETWORK the possibility of their assisting in captioning "Keep it Kingdom/Vandy Colter" at no cost, but they have advised us that they do not have the necessary resources or staffing to perform captioning on our behalf.

4. Captioning "Keep it Kingdom/Vandy Colter" would present an undue burden because we do not have the resources to caption the program ourselves, and it would have to be sent to an outside source for captioning.

5. The added production cost for captioning would make production of the program unaffordable and the time for captioning would make meeting "Keep it Kingdom/Vandy Colter" air-date deadlines impossible.

6. A captioning requirement for "Keep it Kingdom/Vandy Colter" would ultimately cause Kingdom Covenant Christian Center to either terminate or severely limit production of the program, and cause us to lose viewers and supporters who would no longer be able to regularly view the program.

Executed on January 26, 2012



Signature